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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

123 W. Nye Lane
Carson City, Nevada 89710

August 7, 1990

Mr. Byron B. Bradd, P.E.
General Manager
ETICAM
2095 Newlands Drive E.
Fernley, Nevada 89408

Re: Notice of Deficiency, Class 2 Modification dated July 11,
1990, EPA ID No. NVD980895338

Dear Mr. Bradd:

The Division has performed a preliminary review of the above referenced modification and has determined the application to be incomplete. The attached Notice of Deficiency lists each missing and/or deficient item. Please prepare a complete response to each item. Your response shall consist of a totally revised application or separate pages which can be substituted into the above referenced application. Your response must also fulfill the signatory requirements of 40 CFR Section 270.11.

Please submit 2 complete revisions of the application or 2 complete sets of revised pages, whichever is applicable. Also, modify the application at the Lyon County Library.

Note that this is not a final review of your modification application. Upon receipt of the tank certification, we will complete the review and may have additional comments. EPA may also have comments, but will not begin the review until the tank assessment is submitted.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel P. Gross".

Daniel P. Gross, P. E.
Supervisor, Facilities Branch
Waste Management Bureau

Enclosure

cc: Tim Stott, EPA Region IX

NOTICE OF DEFICIENCY FOR
ETICAM'S CLASS II PERMIT MODIFICATION
DATED JULY 11, 1990

Specific Comments

1. Sheet D does not indicate the location of the pug mill mixer or dryers. What one drawing has all new tanks, dryers, etc. proposed for the Class II modification?
2. Section 5 of Modification
Page 26 of 32 - How did you arrive at 218,938 gallons as the maximum inventory? I added 170,351 (existing permit)

+ 50,941 (p. 3, Section 1)
221,292
3. The existing waste analysis plan is not sufficient to satisfy waste analysis plan revision requirements relating to the Third-Third. Is this the intent of Section 6 of the application (pages 3-14 through 3-29) or will the Class III modification include major revisions to the waste analysis plan to satisfy the Land Ban Regulations? Section 6 is also deficient in that there is no narrative describing use of the tables, nor is there any sampling methodology or frequency described for stabilized material (processed through the pug mill). Please see page 22687 of the 6/1/90 Federal Register for some guidance on waste analysis plans with respect to the Third-Third.
4. Pages 5-3, 5-4, and 5-5 of Attachment 2 of the original permit (Inspection Schedule) lists the inspection logs, but does not include the logs themselves. Do logs D, L, V, W (p5-7) and "Tank Contaminants" log need to be modified? If so submit the logs for review.
5. Section 7 - Contingency Plan
 - a) Page 3 - Table 1; under the "EPA Waste code" column for the cyanide bearing solutions category, D003 is listed twice; is one a mistyped code for D002?
 - b) Page 31, Table 3, under Cyanide gases; Cause of Formation; should read acids or lowering.
6. Does the solids receiving area have eye washes, safety showers and fire extinguishers? Figures 3 & 4 of the Contingency Plan do not identify any. Note that Section 8, page 11-17 states that this equipment will be provided.

7. Section 8 - page 11-7 - Table does not include 800 gallon pug mill mixer as shown on Table 1, page 3.
8. Section 8, Page 11-8. The paragraph describing sludge storage references a "sheet E" which was not provided.
9. Section 8, Page 11-10. It states, "Note that both facility generated filter cakes and received filter cakes will be processed through this system, (the hoppers). Why will facility generated filter cakes go through the hoppers?"
10. Section 8, Page 11-11, last paragraph, it states, "Some sludges will be blended to generate larger quantities of uniform composition." Will this blending process be used to mix lower grade sludges with higher grade sludges so as to meet smelter requirements?
11. Section 8, Page 11-15 - Where is the electrowinning process area on Sheet D? Where is the peroxide storage and ozone generation area on Sheet D? Where are the carbon columns?
12. Section 8, Page 11-15 - last sentence of the "Electrowinning Section" is not complete.
13. Section 8, Page 11-15,16. It states, "Additionally, the carbon could be described by one of the "D" codes depending on the material concentrated in the carbon." Note that, if a listed waste is processed through the carbon columns, a "D" code could not be used, as "D" codes only apply if a 40 CFR Part 261 Subpart D, or listed code, does not apply. Please modify this sentence.
14. Section 9, Page 11-4 of the amended closure plan, Closure event #9 "Decontaminate storage pad" does not include an anticipated completion date.
15. Section 9, Page 11-14 of the closure plan.
 - a) Subsection 11.92.1 Subtotal should be \$2,065, not \$2,015. This will change the sum estimate to \$898,518; contingencies to \$89,852; and total estimate to \$988,370.
 - b) Page 11-15, Under 11.92.3 item 4,
20 tons @ \$287.50 ton should be
20 tons @ \$285.50 ton
16. Where is the "detail A" described on Sheet S-1?
17. 40 CFR 264.193 requires a leak detection system. Please describe this system for all the new tanks and indicate on the appropriate drawings.

General Comments

1. Is the new tank designation system (e.g. B/CN2) to be used? If so, you will need to edit drawings and document to reflect this; or add notes to drawings directing reviewer to tank legend on Sheet C.
2. How does ETICAM dispose of its cupels from fire assay?